TIMOTHY COURCHAINE 1 United States Attorney District of Arizona DAVID P. SAVEL 2 2025 APR 23 PM 12: 24 Assistant U.S. Attorney 3 ERK US DISTRICT GOUR United States Courthouse 405 W. Congress Street, Suite 4800 4 Tucson, Arizona 85701
Telephone: 520-620-7300
Email: david.savel@usdoj.gov 5 CR25-01981 TUC-AMM(EJM) Attorneys for Plaintiff 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF ARIZONA 8 United States of America, 9 10 INDICTMENT Plaintiff, 11 **VIOLATIONS:** V. 8 U.S.C. § 1324(a)(1)(A)(v)(I) 8 U.S.C. § 1324(a)(1)(A)(ii) 8 U.S.C. § 1324(a)(1)(B)(i) 12 Aubree Raychael Geremia, 13 (Counts 1-2) (Conspiracy to Transport Illegal Aliens for Profit) 14 Count 1 Defendant. 15 8 U.S.C. § 1324(a)(1)(A)(ii) 8 U.S.C. § 1324(a)(1)(B)(i) (Transportation of Illegal Aliens 16 for Profit) 17 Counts 2 18 THE GRAND JURY CHARGES: 19 COUNT 1 20 From a date unknown to on or about March 30, 2025, in the District of Arizona, 21 Aubree Raychael Geremia, did knowingly and intentionally combine, conspire, 22 confederate, and agree with various other persons known and unknown to the grand jury, 23 to transport and move illegal aliens within the United States by means of transportation or 24 otherwise, in furtherance of such violation of law, and did so for the purpose of commercial 25 advantage or private financial gain, all in violation of Title 8, United States Code, Sections 26 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i). 27

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COUNT 2

On or about March 30, 2025, in the District of Arizona, Aubree Raychael Geremia, knowing and in reckless disregard of the fact that an alien, Catarina Chan, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

A TRUE BILL

FOREPERSON OF THE GRAND JURY Dated: April 23, 2025

TIMOTHY COURCHAINE
United States Attorney
District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

DAVID P. SAVEL Assistant U.S. Attorney

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